

THOMPSON HINE LLP

Riccardo M. DeBari (026232008)
335 Madison Avenue, 12th Floor
New York, NY 10017
T: (212) 344-5680
F: (212) 344-6101
Riccardo.DeBari@ThompsonHine.com
Attorney for Defendant Jeffers Crane Service, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THOMAS H. PILLSBURY, JR. and MELODY
PILLSBURY,

Plaintiffs,

v.

PBF ENERGY, INC., and JEFFERS CRANE
SERVICE, INC.,

Defendants.

Case No. 2:20-cv-09301-MCA-LDW

JUDGE MADELINE COX ARLEO

**DEFENDANT JEFFERS CRANE
SERVICE, INC.'S MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendant Jeffers Crane Service, Inc. ("Jeffers"), shall move this Court on September 8, 2020 to dismiss Plaintiffs' Complaint for lack of personal jurisdiction on the grounds that Jeffers is not subject to general jurisdiction in New Jersey and specific jurisdiction is lacking because Plaintiffs' claims do not arise from or relate to Jeffers's activities in New Jersey. A Memorandum in support of this Motion is attached.

Respectfully submitted,

/s/ Riccardo M. DeBari

Riccardo M. DeBari
Thompson Hine LLP
335 Madison Avenue, 12th Floor
New York, NY 10017-4611
Telephone: (212) 344-5680
Riccardo.DeBari@thompsonhine.com

Of Counsel:

Conor A. McLaughlin (application to appear *pro hac vice* to be filed if necessary)

3900 Key Center

127 Public Square

Cleveland, OH 44114

Telephone: (216) 566-5500

Conor.McLaughlin@thompsonhine.com